



ASSISTANT SECRETARY OF DEFENSE  
6000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-6000



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COMMAND, CONTROL,  
COMMUNICATIONS, AND  
INTELLIGENCE

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS  
CHAIRMAN OF THE JOINT CHIEFS OF STAFF  
UNDER SECRETARIES OF DEFENSE  
DIRECTOR, DEFENSE RESEARCH AND ENGINEERING  
ASSISTANT SECRETARIES OF DEFENSE  
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE  
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE  
DIRECTOR, OPERATIONAL TEST AND EVALUATION  
ASSISTANTS TO THE SECRETARY OF DEFENSE  
DIRECTOR, ADMINISTRATION AND MANAGEMENT  
DIRECTORS OF THE DEFENSE AGENCIES  
DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: Accessibility of DoD Web Sites to People with Disabilities

In 1998, Congress amended the Rehabilitation Act and strengthened provisions covering access to Federal information by people with disabilities. As amended, this act requires Federal agencies to ensure that any electronic and information technology developed, used, procured or maintained by the agency is accessible to people with disabilities, both employees and the public, to the extent that it does not pose an undue burden. The guidelines for demonstrating "undue burden" have not yet been clarified, but are expected to be consistent with other requirements of the Americans with Disabilities Act (ADA) where the term has been defined as "significant difficulty or expense."

The amendment (section 508, attached) also provided for development of access standards, to become part of the Federal Acquisition Regulations, to help agencies determine whether a product or system is accessible, and for enforcement via an administrative complaint process or lawsuit. The Access Board, an independent Federal agency charged with development of the standards, has published proposed standards, but final standards are not yet available. Nonetheless, since web sites are rapidly becoming a primary access tool for both the public and government employees, GSA, in a memo sent to all Federal Chief Information Officers, asked Federal agencies to begin work on their web pages. A target date of July 26, 2000, the 10th anniversary of the ADA, was set for having accessible the agencies' principal web sites and the top 20 sites by volume of use.

As DoD currently has tens of thousands of web pages, with more being added daily, accessibility is a significant requirement that will need to be addressed over time. However, the Department must show an immediate and continuing "good faith" effort to comply with section 508 and this initial request. Therefore, addressees should take immediate action to ensure that



their organization's principal web site is brought into compliance with these requirements, as requested, and that all remaining pages are addressed subsequently.

The GSA Center for Information Technology Accommodation (CITA) has provided the attached web guidelines as an indication of those that may be expected in the final standards as well as a list of some available resources that may assist with this process. The GSA is also offering free technical training for webmasters, to be held in the Washington, DC area and broadcast via satellite. Details and registration are available through the CITA web site (<http://www.itpolicy.gsa.gov/cita/>).

To support and document your efforts, web site owners/sponsors should review their existing web pages against the attached web accessibility guidelines and take necessary steps to achieve compliance. Due to the public interest in this initiative, it is recommended that a plan for remediation and compliance testing be developed and executed. This plan should address, at a minimum:

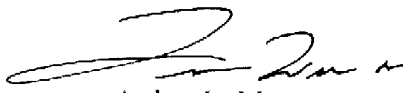
- priorities for addressing the pages (e.g., home page, pages with high volume of usage, new pages, updated pages, old pages),
- schedule,
- resources (e.g., funding, personnel, tools/software, training) required, and
- impact of technology available, including any planned new/upgraded technology.

Other factors (e.g., security) should be addressed as appropriate.

National security systems are exempt from these requirements; however, this exemption shall not be applied to any publicly accessible DoD web site/page. Additionally, non-public web sites supporting exempt systems should comply whenever possible, in keeping with the law's intent of making information more accessible to Department personnel with disabilities.

Several of the proposed requirements listed in the CITA document are relatively simple and inexpensive to implement (e.g., provide text equivalent for each non-text element, make meaning independent of color used). Thus, to the greatest extent practical pending issuance of the final standards, the proposed requirements should be immediately incorporated into each site's guide for web page development. Local web site administration procedures should also be updated to establish/include checks to ensure accessibility of new and updated pages prior to posting.

Questions on application of this guidance to DoD web sites should be directed to Ms. Linda Brown, OASD(C3I), 703-695-2289, [Linda.Brown@osd.mil](mailto:Linda.Brown@osd.mil). Other questions regarding section 508 should be directed to Mr. David Roach, OASD(C3I), Interim DoD Information Technology (IT) Accessibility Coordinator, (703) 602-0980 x163, [David.Roach@osd.mil](mailto:David.Roach@osd.mil), or Ms. Judith Gilliom, OASD(FMP), DoD Disability Program Manager, 703-697-8661, [gilliomj@pr.osd.mil](mailto:gilliomj@pr.osd.mil).



Arthur L. Money  
DoD Chief Information Officer

Attachments

PL 105-220, 1998 HR 1385

PL 105-220, enacted on August 7, 1998, 112 Stat 936

codified as: Section 504 of the Rehabilitation Act, 29 U.S.C. § 794d

## WORKFORCE INVESTMENT ACT OF 1998

### SEC. 508. ELECTRONIC AND INFORMATION TECHNOLOGY.

#### (a) REQUIREMENTS FOR FEDERAL DEPARTMENTS AND AGENCIES.--

##### (1) ACCESSIBILITY.--

(A) DEVELOPMENT, PROCUREMENT, MAINTENANCE, OR USE OF ELECTRONIC AND INFORMATION TECHNOLOGY.--When developing, procuring, maintaining, or using electronic and information technology, each Federal department or agency, including the United States Postal Service, shall ensure, unless an undue burden would be imposed on the department or agency, that the electronic and information technology allows, regardless of the type of medium of the technology--

(i) individuals with disabilities who are Federal employees to have access to and use of information and data that is comparable to the access to and use of the information and data by Federal employees who are not individuals with disabilities; and

(ii) individuals with disabilities who are members of the public seeking information or services from a Federal department or agency to have access to and use of information and data that is comparable to the access to and use of the information and data by such members of the public who are not individuals with disabilities.

(B) ALTERNATIVE MEANS EFFORTS.--When development, procurement, maintenance, or use of electronic and information technology that meets the standards published by the Access Board under paragraph (2) would impose an undue burden, the Federal department or agency shall provide individuals with disabilities covered by paragraph (1) with the information and data involved by an alternative means of access that allows the individual to use the information and data.

##### (2) ELECTRONIC AND INFORMATION TECHNOLOGY STANDARDS.--

(A) IN GENERAL.--Not later than 18 months after the date of enactment of the Rehabilitation Act Amendments of 1998, the Architectural and Transportation

Barriers Compliance Board (referred to in this section as the 'Access Board'), after consultation with the Secretary of Education, the Administrator of General Services, the Secretary of Commerce, the Chairman of the Federal Communications Commission, the Secretary of Defense, and the head of any other Federal department or agency that the Access Board determines to be appropriate, including consultation on relevant research findings, and after consultation with the electronic and information technology industry and appropriate public or nonprofit agencies or organizations, including organizations representing individuals with disabilities, shall issue and publish standards setting forth--

(i) for purposes of this section, a definition of electronic and information technology that is consistent with the definition of information technology specified in section 5002(3) of the Clinger-Cohen Act of 1996 (40 U.S.C. 1401(3)); and

(ii) the technical and functional performance criteria necessary to implement the requirements set forth in paragraph (1).

(B) REVIEW AND AMENDMENT.--The Access Board shall periodically review and, as appropriate, amend the standards required under subparagraph (A) to reflect technological advances or changes in electronic and information technology.

(3) INCORPORATION OF STANDARDS.--Not later than 6 months after the Access Board publishes the standards required under paragraph (2), the Federal Acquisition Regulatory Council shall revise the Federal Acquisition Regulation and each Federal department or agency shall revise the Federal procurement policies and directives under the control of the department or agency to incorporate those standards. Not later than 6 months after the Access Board revises any standards required under paragraph (2), the Council shall revise the Federal Acquisition Regulation and each appropriate Federal department or agency shall revise the procurement policies and directives, as necessary, to incorporate the revisions.

(4) ACQUISITION PLANNING.--In the event that a Federal department or agency determines that compliance with the standards issued by the Access Board under paragraph (2) relating to procurement imposes an undue burden, the documentation by the department or agency supporting the procurement shall explain why compliance creates an undue burden.

(5) EXEMPTION FOR NATIONAL SECURITY SYSTEMS.--This section shall not apply to national security systems, as that term is defined in section 5142 of the Clinger-Cohen Act of 1996 (40 U.S.C. 1452).

(6) CONSTRUCTION.--

(A) EQUIPMENT.--In a case in which the Federal Government provides access to

the public to information or data through electronic and information technology, nothing in this section shall be construed to require a Federal department or agency--

(i) to make equipment owned by the Federal Government available for access and use by individuals with disabilities covered by paragraph (1) at a location other than that where the electronic and information technology is provided to the public; or

(ii) to purchase equipment for access and use by individuals with disabilities covered by paragraph (1) at a location other than that where the electronic and information technology is provided to the public.

(B) SOFTWARE AND PERIPHERAL DEVICES.--Except as required to comply with standards issued by the Access Board under paragraph (2), nothing in paragraph (1) requires the installation of specific accessibility-related software or the attachment of a specific accessibility-related peripheral device at a workstation of a Federal employee who is not an individual with a disability.

(b) TECHNICAL ASSISTANCE.--The Administrator of General Services and the Access Board shall provide technical assistance to individuals and Federal departments and agencies concerning the requirements of this section.

(c) AGENCY EVALUATIONS.--Not later than 6 months after the date of enactment of the Rehabilitation Act Amendments of 1998, the head of each Federal department or agency shall evaluate the extent to which the electronic and information technology of the department or agency is accessible to and usable by individuals with disabilities described in subsection (a)(1), compared to the access to and use of the technology by individuals described in such subsection who are not individuals with disabilities, and submit a report containing the evaluation to the Attorney General.

(d) REPORTS.--

(1) INTERIM REPORT.--Not later than 18 months after the date of enactment of the Rehabilitation Act Amendments of 1998, the Attorney General shall prepare and submit to the President a report containing information on and recommendations regarding the extent to which the electronic and information technology of the Federal Government is accessible to and usable by individuals with disabilities described in subsection (a)(1).

(2) BIENNIAL REPORTS.--Not later than 3 years after the date of enactment of the Rehabilitation Act Amendments of 1998, and every 2 years thereafter, the Attorney General shall prepare and submit to the President and Congress a report containing information on and recommendations regarding the state of Federal department and agency compliance with the requirements of this section, including actions regarding individual complaints under subsection (f).

(c) COOPERATION.--Each head of a Federal department or agency (including the Access Board, the Equal Employment Opportunity Commission, and the General Services Administration) shall provide to the Attorney General such information as the Attorney General determines is necessary to conduct the evaluations under subsection (c) and prepare the reports under subsection (d).

(f) ENFORCEMENT.--

(1) GENERAL.--

(A) COMPLAINTS.-- Effective 2 years after the date of enactment of the Rehabilitation Act Amendments of 1998, any individual with a disability may file a complaint alleging that a Federal department or agency fails to comply with subsection (a)(1) in providing electronic and information technology.

(B) APPLICATION.--This subsection shall apply only to electronic and information technology that is procured by a Federal department or agency not less than 2 years after the date of enactment of the Rehabilitation Act Amendments of 1998.

(2) ADMINISTRATIVE COMPLAINTS.--Complaints filed under paragraph (1) shall be filed with the Federal department or agency alleged to be in noncompliance. The Federal department or agency receiving the complaint shall apply the complaint procedures established to implement section 504 for resolving allegations of discrimination in a federally conducted program or activity.

(3) CIVIL ACTIONS.--The remedies, procedures, and rights set forth in sections 505(a)(2) and 505(b) shall be the remedies, procedures, and rights available to any individual with a disability filing a complaint under paragraph (1).

(g) APPLICATION TO OTHER FEDERAL LAWS.--This section shall not be construed to limit any right, remedy, or procedure otherwise available under any provision of Federal law (including sections 501 through 505) that provides greater or equal protection for the rights of individuals with disabilities than this section.

## **Section 508 (NPRM) Web Accessibility Standards**

This page contains the NPRM's specific requirements for Web-based information or applications. The Section 508 Web site [<http://www.section508.gov>] has a link to the NPRM under Proposed Standards. The Web site of the Center for Information Technology Accommodation (CITA) [<http://www.itpolicy.gsa.gov/cita>] has a link to a document titled: "A Concordance of NPRM Requirements and WCAG Checkpoints and Curriculum Examples." The Concordance relates the requirements listed below to appropriate examples in the W3C Curriculum for Web Content Accessibility.

### **1194.23 Component specific requirements.**

#### ***(c) Web-based information or applications.***

- (1) A text equivalent for every non-text element shall be provided via "alt" (alternative text attribute), "longdesc" (long description tag), or in element content.
- (2) Web pages shall be designed so that all information required for navigation or meaning is not dependent on the ability to identify specific colors.
- (3) Changes in the natural language (e.g., English to French) of a document's text and any text equivalents shall be clearly identified.
- (4) Documents shall be organized so they are readable without requiring an associated style sheet.
- (5) Web pages shall update equivalents for dynamic content whenever the dynamic content changes.
- (6) Redundant text links shall be provided for each active region of a server-side image map.
- (7) Client-side image maps shall be used whenever possible in place of server-side image maps.
- (8) Data tables shall provide identification of row and column headers.
- (9) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (10) Frames shall be titled with text that facilitates frame identification and navigation.
- (11) Pages shall be usable when scripts, applets, or other programmatic objects are turned off or are not supported, or shall provide equivalent information on an alternative accessible page.
- (12) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (13) An appropriate method shall be used to facilitate the easy tracking of page content that provides users of assistive technology the option to skip repetitive navigation links.

**GSA Office of Governmentwide Policy  
Center for Information Technology Accommodation**

## **A Short List of References for Accessible Web Site Design**

- More information about these and further resources are available from the Center for Information Technology Accommodation (CITA) Web site: <http://www.itpolicy.gsa.gov/cita>. The primary resource for the GSA Web design training classes is the Curriculum for Web Content Accessibility Guidelines 1.0, which is listed below under W3C resources.

### **Government Resources**

- SECTION 508: The Notice of Proposed Rule Making for Electronic and Information Technology Accessibility Standards  
<http://www.access-board.gov/scc508/nprm.htm>
- Center for IT Accommodation (GSA Office of Governmentwide Policy), including Tools To Make Your Web Page Accessible (Check Your Page)  
<http://www.itpolicy.gsa.gov/cita>
- Federal Information Technology Accessibility Initiative  
<http://www.section508.gov>

### **World Wide Web Consortium (W3C) Resources**

- Curriculum for Web Content Accessibility Guidelines 1.0  
<http://www.w3.org/WAI/wcag-curric>
- Web Content Accessibility Guidelines 1.0 (plus Techniques and Errata)  
<http://www.w3.org/TR/1999/WAI-WEBCONTENT-19990505/>
- How People with Disabilities Use the Web: DRAFT NOTE  
<http://www.w3.org/WAI/EO/Drafts/profiles-19990930.html>
- Web Content Accessibility Guidelines Impact Matrix: DRAFT NOTE  
<http://www.w3.org/WAI/GL/NOTE-WCAG-impact-matrix-19990810>
- User Agent Support for Accessibility  
<http://www.w3.org/WAI/Resources/WAI-UA-Support>
- Web Style Sheets  
<http://www.w3.org/Style/>
- HTML Validation Service  
<http://validator.w3.org/>

### **Other Resources**

- Adobe PDF: Accessibility Information  
<http://access.adobe.com>
- Java™ Accessibility and Usability Work  
<http://trace.wisc.edu/world/java/java.htm>
- Universal Design  
<http://trace.wisc.edu/>